

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

**BOBBY BLAND, DANIEL RAY
CARTER, JR., DAVID W. DIXON,
ROBERT W. MCCOY, JOHN C.
SANDHOFER and DEBRA H.
WOODWARD,**

Plaintiffs,

v.

**B. J. ROBERTS, individually and
in his official capacity as Sheriff
of the City of Hampton, Virginia,**

Defendant.

CASE NO: 4:11cv45

AFFIDAVIT OF COL. KAREN BOWDEN

**COMMONWEALTH OF VIRGINIA
CITY OF HAMPTON, to-wit:**

1. At all times relevant to plaintiffs' Complaint, I have worked for Sheriff Roberts in the Hampton Sheriff's Office in the position of Colonel, second in command.
2. I base this Affidavit on personal knowledge and on records maintained in the ordinary and regular course of business.
3. Prior to the November 2009 election, Major Wells-Major and I contacted Sheriff's personnel assigned to the two shifts scheduled to be off on election day to ask for assistance at the polls.
4. The two shifts comprised approximately 40 – 45 employees.

5. Participation was strictly voluntary. Agreeing to volunteer at the polls was not a precondition of reappointment by Sheriff Roberts and I did not indicate that to any employee with whom I spoke.

6. Sheriff Roberts reappointed many deputies who did not volunteer to work the polls on Election Day.

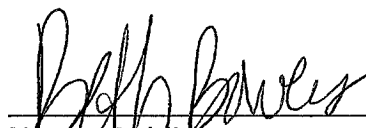
7. Sheriff Roberts also reappointed many deputies who did not otherwise volunteer to work on his campaign during their off duty hours.

8. At no time did I discuss with Sheriff Roberts which candidate plaintiffs or any other appointee supported.


COL. KAREN BOWDEN

This day personally appeared before me, the undersigned Notary Public in and for the county/city and state aforesaid, Col. Karen Bowden, who after first being duly sworn, deposed and said that the facts contained in the foregoing instrument are true and correct.

Sworn and subscribed to before me this 8 day of December, 2011.


Notary Public

My Commission Expires: 1/31/14
Registration No.: 7371879